



U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

APR 3 1988

400 Seventh Street, S.W.  
Washington, D.C. 20590

Mr. Lee R. Zwiefelhofer  
Allantoic Systems  
600 Second Street, NE  
Mail Station MN11-2167  
Hopkins, MN 55343

Dear Mr. Zwiefelhofer:

This is in response to your letter regarding the proper method of completing the dangerous goods declaration (i.e., shipping paper) for dangerous goods shipped by aircraft under the International Civil Aviation Organization's (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air and the International Air Transport Associations (IATA) Dangerous Goods Regulations. You asked whether the Packing Group and the Packing Instruction are required to be entered on the declaration of dangerous goods document.

The IATA regulations do not have official standing in the United States. For shipments made by aircraft, the regulations authorized in 49 CFR 171.11 as an alternative to compliance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) are the ICAO Technical Instructions. Under ICAO Technical Instructions, "4:4.1.2", the declaration of dangerous goods must contain the basic description, which includes the proper shipping name, hazard class, identification number and packing group.

However, the ICAO Technical Instructions do not indicate a packing group for any explosive and therefore none should be included in the basic description. An example of a basic description for an explosive would be: "Articles, explosive, n.o.s. (\*Technical name), 1.4E, UN 0471", in that sequence. Additional information must be included on the dangerous goods document as specified in ICAO Technical Instructions, "4:4.1.3", including the "packing instruction" citation. The reference to packing instruction 101 is correct in that this packing instruction provides for the competent authority (in this case, the Research and Special Programs Administration) to authorize the appropriate packaging. For your information, the HMR do not specify a form for a shipping paper.

I hope this information is helpful. If we can be of further assistance, please contact us.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



980019

Engineer  
File 171  
SC 413, 4.2

ALLIANT TECHSYSTEMS

600 Second Street NE  
Hopkins, MN 55343

May 27, 1997

Associate Administrator for Hazardous Materials Safety  
U.S. Department of Transportation  
400 7th Street SW, Room 8436  
Washington, D.C. 20590-0001

Attention: Ms. Suzanne Hedgepeth  
Chief - Exemption Branch

Dear Ms. Hedgepeth:

Alliant Techsystems inc., Hopkins, MN requests a modification to Exemption DOT-E 8451, Section 4. In addition, Alliant Techsystems also requests a written interpretation concerning the proper method of completing IATA/ICAO Dangerous Goods Declarations when using DOT-E 8451. This application for Modification is being submitted to you in duplicate.

Alliant Techsystems requests that paragraph 172.320 be added to Section 4 of the Regulations From Which Exempted. Since this exemption is used to ship up to 25 grams of developmental explosives which have not be Hazard Classified by the DOT, Alliant can not comply with placing the "EX-#" on the packaging or on the shipping papers. Alliant has had some carriers that require the "EX-#" to be placed on the packaging and is restricting our ability to quickly ship material under this exemption in a cost effective manner. This information was also reviewed with Spencer Watson and he agreed that paragraph 172.320 should be added to the Exemption.

Additionally, Alliant Techsystems requests a written interpretation from your office on the proper method for completion of a Dangerous Goods Declaration for Air shipments made under ICAO/IATA. Alliant has been having difficulties with shipments being returned from Air carriers because their inspectors don't agree with the way we are completing the Dangerous Goods Declaration. The 2 primary areas of concern are whether or not a Packaging group II should be placed on the Declaration and whether or not the packing Instruction 101 should be entered on the Declaration. I have attached a sample declaration of how Federal Express and Emery Worldwide want the ICAO/IATA Dangerous Goods Declaration filled out for Exemption DOT-E 8451. I also reviewed this information with a Jim Stilwell who is a special agent at the FAA. He thought that the Packing instruction number "101" shouldn't be in the column under

packing instruction. As you can see there is some disagreement on what goes where. Your official written interpretation on this matter will be greatly appreciated.

All correspondence should be sent to my attention at the address listed above, Mail Station MN11-2167. If you have any further questions, please contact me at 612-931-5120 or by fax at 612-931-6956.

Sincerely,

ALLIANT TECHSYSTEMS INC.

A handwritten signature in black ink, appearing to read "Lee R. Zwiefelhofer", with a stylized flourish at the end.

Lee R. Zwiefelhofer  
Senior Principal Transportation Specialist

## SHIPPER'S DECLARATION FOR DANGEROUS GOODS

(Provide at least two copies to the airline.)

Shipper		Air Waybill No.	
Consignee		Page      of      Pages	
Two completed and signed copies of this Declaration must be handed to the operator		Shipper's Reference Number (optional)	
<b>TRANSPORT DETAILS</b> This shipment is within the limitations prescribed for: (delete non-applicable) <input checked="" type="checkbox"/> PASSENGER AIRCRAFT <input type="checkbox"/> CARGO AIRCRAFT ONLY		Airport of Departure  Airport of Destination:	
		Shipment type: (delete non-applicable) NON-RADIOACTIVE <del>EXCEPTED</del>	

## WARNING

Per ICAO Regulations  
Per FedEx and ~~Emerg~~  
EXEMPTION DOT-E8451

Failure to comply in all respects with the applicable Dangerous Goods Regulations may be in breach of the applicable law, subject to legal penalties. This Declaration must not, in any circumstances, be completed and/or signed by a consolidator, a forwarder or an IATA cargo agent.

## NATURE AND QUANTITY OF DANGEROUS GOODS (see Subsections 6.6 and 8.1 of IATA Dangerous Goods Regulations)

Dangerous Goods Identification					Quantity and Type of packing	Packing Inst.	Authorization
Proper Shipping Name	Class or Division	UN or ID No.	Packing Group	Subsidiary Risk			
Articles, Explosive, N.O.S., (* enter 2 constituents)	1.4E	UN0471			1 Steel Box x — Kg	101	DOT-E 8451

## Additional Handling Information

This shipment prepared according to ICAO/IATA Regulations  
 Net Explosive weight = — Kg

IATA Emergency Contact Tel. No.

1-800-535-5035

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Name/Title of Signatory

Place and Date

 Signature  
 (see warning above)